

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	<b>ORDER</b>
 - v. -	:	S3 20 Cr. 188 (JSR)
HAMID AKHAVAN,	:	
a/k/a "Ray Akhavan," and	:	
 RUBEN WEIGAND,	:	
 Defendant.	:	

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Upon the annexed application of AUDREY STRAUSS, United States Attorney for the Southern District of New York, for an order pursuant to Title 18, United States Code, Sections 6002 and 6003, compelling MICHAEL TASSONE ("TASSONE") to testify and to provide other information in United States v. Hamid Akhavan, et al., S3 20 Cr. 188 (JSR), in the United States District Court for the Southern District of New York, and upon the declaration of Assistant United States Attorney Emily Deininger, submitted in support thereof; and it appearing that,

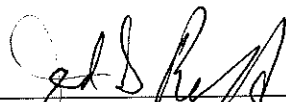
1. TASSONE is scheduled to appear as a witness in United States v. Hamid Akhavan, et al.; and,
2. It is expected that TASSONE will refuse to testify on the basis of his privilege against self-incrimination; and,
3. It is the judgment of the United States Attorney that the testimony and other information that TASSONE could give in United States v. Hamid Akhavan, et al., may be necessary to the public interest; and,

Upon the approval of the aforesaid application by the Department of Justice, by the Assistant Attorney General, pursuant to the authority vested in him by Title 18, United States Code, Section 6003 and 28 C.F.R. 0.175; it is hereby:

ORDERED that, pursuant to Title 18, United States Code, Sections 6002 and 6003, TASSONE give testimony and provide other information as to all matters about which he may be questioned in United States v. Hamid Akhavan, et al.; and

IT IS FURTHER ORDERED that, pursuant to Title 18, United States Code, Sections 6002 and 6003, no testimony or other information compelled under this Order, or any information directly or indirectly derived from such testimony or other information, may be used against TASSONE in any criminal case, except a prosecution for perjury, giving a false statement, or otherwise failing to comply with this Order.

This order shall become effective only if after the date of this Order TASSONE refuses to testify or provide other information on the basis of his privilege against self-incrimination.

  
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THE HONORABLE JED S. RAKOFF  
United States District Judge

Dated: New York, New York  
March 2, 2021

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : **APPLICATION FOR IMMUNITY ORDER**

- v. - : S3 20 Cr. 188 (JSR)

HAMID AKHAVAN, :  
a/k/a "Ray Akhavan," and :

RUBEN WEIGAND, :  
Defendant. :

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AUDREY STRAUSS, United States Attorney for the Southern District of New York, for the reasons hereinafter set forth and upon the declaration of Assistant United States Attorney EMILY DEININGER, hereby requests an order compelling MICHAEL TASSONE to give testimony and provide other information pursuant to the provisions of Title 18, United States Code, Sections 6002 and 6003, and respectfully alleges as follows:

1. MICHAEL TASSONE ("TASSONE") is scheduled to testify in United States v. Hamid Akhavan, et al., S3 20 Cr. 188 (JSR), in the United States District Court for the Southern District of New York.

2. This application is made in good faith and upon my judgment that the testimony from TASSONE may be necessary to the public interest.

3. It is expected that TASSONE will refuse to testify in United States v. Hamid Akhavan, et al. on the basis of his privilege against self-incrimination.

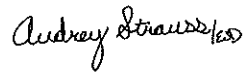
4. This application is made with the approval of the Department of Justice, by the Assistant Attorney General, pursuant to the authority vested in him by Title 18, United States Code, Section 6003 and Title 28, Code of Federal Regulations, Section 0.175. A copy of the letter

setting forth the approval of the Department of Justice for this application is attached hereto.

WHEREFORE, the United States of America by the United States Attorney for the Southern District of New York respectfully requests the Court to issue an order requiring TASSONE to give testimony in United States v. Hamid Akhavan, et al. and provide other information with regard to all matters about which he may be questioned, pursuant to the provisions of Title 18, United States Code, Sections 6002 and 6003.

Dated: New York, New York  
February 25, 2021

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Audrey Strauss".

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AUDREY STRAUSS  
United States Attorney



U.S. Department of Justice

Criminal Division

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Office of the Assistant Attorney General

Washington, D.C. 20530

February 11, 2021

Ms. Audrey Strauss  
Acting United States Attorney  
Southern District of New York  
United States Attorney's Office  
1 St. Andrew's Plaza  
New York, NY 10007

Attention: Emily Deininger, Tara Lamorte, Nicholas Folly  
Assistant United States Attorneys

Re: *United States v. Hamid Akhavan, et. al.*

Dear Ms. Strauss:

Pursuant to the authority vested in me by 18 U.S.C. § 6003(b) and 28 C.F.R. § 0.175(a), I hereby approve your request for authority to apply to the United States District Court for the Southern District of New York for an order, pursuant to 18 U.S.C. §§ 6002-6003, requiring Michael Tassone to give testimony or provide other information in the above matter and in any further proceedings resulting therefrom or ancillary thereto, provided that the witness refuses to testify or provide information on the basis of the privilege against self-incrimination.

Sincerely,

A handwritten signature in black ink, reading "J. A. H. Hodge", is written over a horizontal line.

Jennifer A.H. Hodge  
Deputy Assistant Attorney General

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	<b>DECLARATION</b>
 - v. -	:	 S3 20 Cr. 188 (JSR)
HAMID AKHAVAN,	:	
a/k/a "Ray Akhavan," and	:	
 RUBEN WEIGAND,	:	
 Defendant.	:	

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STATE OF NEW YORK  
COUNTY OF NEW YORK

EMILY DEININGER, pursuant to Title 28, United States Code, Section 1746,  
hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the office of AUDREY STRAUSS, United States Attorney for the Southern District of New York, and as such am one of the attorneys responsible for the prosecution of the above-captioned case.
2. This Declaration is made in support of the application by the United States Attorney for the Southern District of New York for an order pursuant to Title 18, United States Code, Sections 6002 and 6003 directing MICHAEL TASSONE ("TASSONE") to give testimony and provide other information in the above-captioned case.
3. The witness may refuse to testify about certain subjects on the basis of his privilege against self-incrimination.

4. Upon information and belief, TASSONE can give relevant testimony in the above-mentioned matter, which testimony may be necessary to the protection of the public interest.

5. This application for immunity is made in good faith.

WHEREFORE, and upon the application of Audrey Strauss, United States Attorney for the Southern District of New York, annexed hereto, it is respectfully requested that the application be granted.

Dated: New York, New York  
February 25, 2021



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Emily Deininger  
Assistant United States Attorney